

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

DILORENZO BIOMEDICAL, LLC,	§	
	§	
	§	
Plaintiff,	§	
v.	§	
	§	Civil Action No. 4:23-cv-1800
LIVANOVA, INC., and LIVANOVA	§	Patent Case
USA, INC.,	§	Jury Trial Demanded
	§	
Defendants.	§	
	§	
	§	

JOINT MOTION FOR EXTENSION OF DEADLINE TO COMPLETE MEDIATION

COME NOW Plaintiff DiLorenzo Biomedical, LLC (“Plaintiff”) and Defendants LivaNova, Inc. and LivaNova USA, Inc. (collectively, “Defendants”) and file this Joint Motion for Extension of Deadline to Complete Mediation, and in support thereof, would respectfully show as follows:

Plaintiff filed this Lawsuit on May 17, 2023 [Dkt. 1], served Defendants on August 9, 2023, and Defendants filed their Motion to Dismiss on October 16, 2023 [Dkt. 21]. On October 24, 2023, the Court held its Initial Conference in this case and entered the Scheduling Order [Dkt. 28] (as modified on December 20, 2023, Dkt. 38). Pursuant to the Scheduling Order, the deadline for the parties to select a mediator was January 12, 2024 and the deadline for the parties to complete mediation is February 16, 2024. *See* Dkt. 38.

The parties have retained Lawrence Graham, Esq. to serve as the mediator. After working to coordinate the schedules of Mr. Graham, the parties, and their counsel, have agreed to an in-person mediation on February 27, 2024. As such, the parties respectfully request that

the Court extend the deadline to complete mediation to March 1, 2024. This extension is not sought for the purpose of delay.

WHEREFORE, Plaintiff and Defendants respectfully request that this Court grant this Joint Motion for Extension of Deadline to Complete Mediation and extend the deadline to complete mediation to March 1, 2024.

Dated: February 13, 2024

Respectfully submitted,

/s/ Ronald Abramson

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